

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Federal State Joint Board)	CC Docket No. 96-45
On Universal Service)	
)	
Forward-Looking Mechanism)	CC Docket No. 97-160
For High Cost Support for)	DA 98-848
Non-Rural LECs)	

REPLY COMMENTS OF SPRINT LOCAL TELEPHONE COMPANIES

In accord with the May 4, 1998, Public Notice issued herein (DA 98-848),¹ Sprint hereby replies to comments filed June 1, 1998 regarding *cost model input issues* and *revenue benchmark issues*, by AT&T and MCI (referred to collectively as the Hatfield (HAI) Model sponsors (HMS)).

In general, most of the issues raised by the HMS in their comments have been argued and re-argued sufficiently before this Commission. Hence, Sprint will not use these replies to reiterate positions that are already on the record. Rather, Sprint chooses to concentrate its reply comments on a few key issues, not previously addressed in Sprint's pleadings.

Geocode Data

On page 3 the HMS state that because "the debate has shifted from whether or not geocode data should be used to what *type* of geocode data to use, the BCPM and HCPM can no longer be considered viable candidates." This statement is completely without foundation. The

¹ On May 22, 1998, the Chief of the Accounting Policy Division issued an order extending the date on which reply comments were to be filed to June 12, 1998. In the Matter of Federal State Joint Board on Universal Service and Forward-Looking Mechanism For High Cost Support for Non-Rural LECs, CC Docket Nos. 96-45, 97-160, DA 98-990, Order, released May 22, 1998.

BCPM Sponsors (including Sprint) have participated in numerous *ex parte* discussions with the FCC outlining the exact way that the BCPM could use geocode data.²

The reason the BCPM Sponsors have chosen *not* to use geocode data to date is the same reason the FCC has requested information on alternatives to the geocode data used by the Hatfield Model: *existing sets of geocode data (including the HAI set) are seriously flawed*. The HMS revealed that their data locates an unacceptable 15% of customers in low-density areas, the areas of highest concern for universal service issues. This same concern was expressed in the initial comments filed by Aliant Communications Co., USTA, GTE, SBC and others.

Sprint has stated on numerous occasions that, particularly for rural areas, using geocoded data is desirable and appropriate if 1) complete and accurate data exists and 2) the model (any model) actually uses the data to build outside plant. That is, if outside plant is built to the latitude/longitude coordinates representing the customer location. *The HAI (Hatfield) Model in its current form meets neither of these conditions*. The model's preprocessing takes incomplete data and uses it to construct polygons. The HAI Model then discards the geocoding entirely and distorts the customers' locations by abandoning the characteristics of the polygon itself (the total dispersion of customers in that polygon) and abandoning the location information within the polygon (which represents how customers might be served, given that dispersion). In the process, it moves customer locations literally miles from the original locations.

Sprint strongly believes that in the absence of accurate and complete geocode data, locations and customer dispersion in rural areas are much better approximated by the BCPM's approach which uses road mileage distribution as a surrogate for population distribution. The strength of this approach is the statistical validity (again, demonstrated in *ex parte* presentations to the FCC and numerous state commissions) of the relationship between road miles and

² See (among others) BCPM Sponsors' *ex parte* presentation February 23, 1998.

population (i.e. the high correlation between the two). The choice facing the Commission is actually between the BCPM's *use* of road mileage data and the Hatfield Model's *non-use* of incomplete geocoded data. Contrary to statements included in the HMS comments (page 5), the FCC currently has no model before it that makes "consistent use" of geocode data.

In the event that the Commission officially request the BCPM Sponsors to make use of geocode data (instead of simply requiring the model to be capable of accepting geocode data (FCC Guidelines)) the Sponsors are ready to do so.

Households vs. Housing Units

On page 7 of their comments the HMS state their criteria for what a cost model should do with regard to modeling the "depth" and "geographic scope" of a network (matching current number of lines deployed and geographically "scoping"³ the network to reach all areas currently served.) They also state that only the HAI Model accomplishes both steps.

Like the previous geocoding statement, this remark is also completely without foundation. The BCPM Sponsors have stated numerous times that the issue of building to households or housing units is a *policy* question, not a *modeling* question. *The BCPM is capable of building to either households or housing units, and whichever method is adopted by the FCC or any state regulatory body, that is the method the model can use to produce costs.* To imply, as the HMS do in their comments, that the HAI Model is somehow preferable or superior because it interprets policy a certain way is ridiculous.

The BCPM currently builds to all housing units because the BCPM Sponsors feel this approach comes closest to the spirit of Universal Service as put forth in the 1996 Telecom Act. Section 254 (b) (2) of the Act refers to "all areas of the Nation". If the FCC chooses to interpret

³ The HMS do not define "scoping".

this statement as "all areas of the Nation that currently have telephone service" the BCPM

Sponsors are ready to use the model in such a manner.


Inputs

On page 2 of their comments the HMS state that arguments and evidence in support of their model's default input values "have never been refuted." This statement is absurd. In dozens of state proceedings across the country the "evidence" supporting the HAI default inputs has been questioned, analyzed and successfully refuted. Even in states such as Nevada⁴ where the Hatfield Model (in some form) was initially considered for use, the acceptance of the default input values has always been a separate question and for many key inputs the default values have not been accepted by the respective Commission or regulatory body.

At the Federal level, it is Sprint's understanding that the proxy model discussion to this point has centered on *platform* issues, not *inputs*. As such, it is puzzling how the HMS can claim that the support for their values has never been refuted when the FCC has not asked for refutation or comments from interested parties.

Respectfully submitted,

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⁴ Nevada Costing Docket Number 96-9035, among others.

CERTIFICATE OF SERVICE

I, Melinda L. Mills, hereby certify that I have on this 12th day of June 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Local Telephone Companies" in the Matter of Federal-State Joint Board on Universal Service, Forward-Looking Mechanism for High Cost Support for Non-Rural LECs, CC Docket Nos. 96-45, 97-160, DA 98-848, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.



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